



EA Land - Intermountain Asbestos Site (Salt Lake City, Utah)

David Wilson

to:

Joyce Ackerman, gsorenson@utah.gov, Vicki Bennett (vicki.bennett@ci.slc.ut.us),
rdelegge@slco.org

06/09/2011 04:03 PM

Cc:

"durban@utah.gov", Bill Rees, Robert Schmidt

Hide Details

From: David Wilson <David.Wilson@erm.com>

To: Joyce Ackerman/R8/USEPA/US@EPA, "gsorenson@utah.gov"
<gsorenson@utah.gov>, "Vicki Bennett (vicki.bennett@ci.slc.ut.us)"
<vicki.bennett@ci.slc.ut.us>, "rdelegge@slco.org" <rdelegge@slco.org>

Cc: "durban@utah.gov" <durban@utah.gov>, Bill Rees <brees@utah.gov>, Robert Schmidt
<robert@pegdevelopment.com>

History: This message has been replied to.

1 Attachment



L-DEQ Comment Response 6-6-11.pdf

Greetings:

I am providing electronic an electronic copy of the attached response letter to the Utah DERR, which was prepared by ERM on behalf of EA Land for the subject site in Salt Lake City. You were copied on the 2010 comment letter by Dale Urban of the Utah DERR. EA Land is preparing to continue its development plan for this site at this time. A revised Site Development Work Plan was submitted to Mr. Urban, which is consistent with the responses provided in this letter.

Please let me know if you have any questions.

Regards,
Dave Wilson

David S. Wilson, P.E., P.G.
Environmental Resources Management (ERM)
102 West 500 South, Suite 650
Salt Lake City, Utah 84101
Ph. (801)595-8400
Fx. (801)595-8484
Mob. (801)916-6957
david.wilson@erm.com

This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately at (303) 741-5050 and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: <http://www.erm.com>

Environmental
Resources
Management

102 West 500 South
Suite 650
Salt Lake City
Utah 84101-2334
(801) 595-8400
(801) 595-8484 (fax)
www.erm.com

June 6, 2011
Reference: 0121929

Mr. Dale T. Urban, P.G.
Division of Environmental Response and Remediation
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, Utah 84114



RE: *Response to Comments on Site Redevelopment Work Plan for Former
Vermiculite Intermountain Site*

Dear Mr. Urban:

Environmental Resources Management (ERM) has prepared this letter on behalf of EA Land Investment to respond to comments provided by the Utah Department of Environmental Quality (UDEQ) in your letter to ERM dated August 17, 2010. Your letter provided comments on the *Site Redevelopment Work Plan Salt Lake Mixed Use Hotel Project* (Work Plan) submitted to the UDEQ in June 2010. We are providing this letter in response to the comments provided in your letter. The general comments provided by the UDEQ are presented in italics in the sections below, followed by our response. We are also providing a revised Work Plan that addresses your comments.

Site Redevelopment Work Plan Comments

Section 2.2 Restrictions on Site Modifications

Comment 1: Under Part 5(b) of the Environmental Covenant, it addresses the need for workers to be certified asbestos workers in the State of Utah. Refer to UAC R307-801-6. This certification requirement needs to be stated in the Work Plan.

Response 1: The requirement for workers to be certified asbestos workers in the State of Utah has been added to the Work Plan in Section 2.2; it is noted that there are a limited number of asbestos certified contractors that also perform excavation services applicable to this site, but EA Land has identified a certified contractor that can support this work.

Section 2.7 Landscaping

Comment 2: Areas within the site boundary proposed for vegetative cover will be covered with, at minimum, 2 feet of clean, imported fill material.

Response 2: The requirement that all areas within the site boundary proposed for vegetation be covered with 2 feet of with clean, imported fill material has been added to Section 2.7.

Section 2.9 Site Permits

Comment 3: Needs to indicate that a NESHAP Demolition Notification form is required to be submitted to the Utah Division of Air Quality.

Response 3: A NESHAP Demolition Notification form has been listed as a requirement in Section 2.9.

Section 3.1 Earthwork

Comment 4: The asphalt cap cannot be disturbed until measures are in place to prevent the release of asbestos and workers are protected. From the very beginning of the work, the work area must be divided into an exclusion zone, contamination reduction zone (decontamination zone), and a support zone. These areas must be clearly delineated and explained in detail to workers on-site. These zones can be moved and managed under the proposed phased soil removal approach.

Response 4: Prior to disturbing the asphalt cap, the contractor will provide a plan which divides the work area into the appropriate work zones consistent with the HAZWOPER regulations (4 CFR 1910.120). Maps which detail each zone will be posted and workers on-site will be educated regarding operations within each zone.

Comment 5: On the Pacificorp property, asbestos-contaminated soils were found at depths greater than 15 feet. The Work Plan should include recognition that soils at the site may be contaminated at depths greater than 15 feet and have procedures for properly addressing that.

Response 5: Text has been added to Section 3.1 stating that soils at the site may contain asbestos at depths greater than 15 feet.

Comment 6: The Work Plan should address procedures for clearance sampling of subsurface soils. Otherwise, all soils at the site must be treated and handled as asbestos contaminated.

Response 6: EA Land proposes to manage all soil as potentially containing asbestos, and does not plan to implement a program for clearance of soil as being unimpacted by asbestos. The soil will either remain on-site beneath concrete or asphalt surface or be removed from the site for proper off-site disposal as asbestos-containing soil in accordance with the plan.

Comment 7: The Work Plan should clarify that all "asbestos-containing soils" are defined as any soils containing any quantity of Libby amphibole asbestos and are not limited to the NESHAP definition of asbestos containing material (ACM) of one percent or greater asbestos content.

Response 7: Text has been added to Section 3.1 stating that Asbestos-containing soils are defined as any soils containing any quantity of Libby amphibole asbestos and are not limited to the NESHAP definition of asbestos containing material (ACM) of one percent or greater asbestos content.

Section 3.2 Dust Suppression and Air Quality Protection

Comment 8: Fails to set a no visible emissions standard when working with asbestos contaminated soil.

Response 8: This section has been modified in order to address the no visible emissions standard.

Comment 9: There is no acceptable level of asbestos emissions for Libby amphibole-asbestos to receptors outside the exclusion zone.

Response 9: This requirement has been addressed in Section 3.2.

Comment 10: The contractor responsible for the air monitoring at the site needs to be a separate company from the contractor doing the actual work to avoid conflict of interest.

Response 10: A separate company from the contractor will be utilized for the air monitoring at the site.

Comment 11: Any areas to be disturbed must be thoroughly wetted with water prior to disturbance. There must be sufficient water on site to conduct this activity, such as affire hydrant or a water truck. There should be sufficient water pressure, volume, and appropriate water hoses or sprayers to immediately knock down any inadvertently released dusts. The water hoses must be manned by personnel at all times that the cap or contaminated soil is being disturbed. The report seems to suggest that some compaction work at the site will be conducted without using any water to wet contaminated soils; more discussion of this work is needed in the Work Plan and how dust will be immediately contained if the compaction does generate dust from asbestos-contaminated soils.

Response 11: Section 3.2 of the Work Plan states that "if water is found to be insufficient to control dust, additional measures, such as more water, work stoppage, wind breaks/barrier and chemical treatments, will be considered and implemented."

Comment 12: Any contaminated stockpiled soils must be adequately wetted and covered at all times except when actively used. These soils may only be stockpiled inside an exclusion zone. Consideration should be given toward using lined and covered containers for contaminated soils instead of stockpiles within berms. The Work Plan should clarify that all asbestos-contaminated soils will be disposed as ACM and not only those with one percent or greater asbestos content

Response 12: Stockpiling and disposal requirements have been added to Section 3.1.

Section 3.5 Storm Water Management and Erosion Control

Comment 13: UAC R307-801-14(f) requires asbestos waste water to be filtered to 5 microns.

Response 13: The required filter has been changed from a 10 micron filter to a 5 micron filter.

Section 3.6 Management of Contaminated Soils

Comment 14: Does not address contamination of trucks hauling asbestos-contaminated soils to an asbestos landfill. A plan must be developed for transportation and disposal of contaminated soils including but not limited to how

haul trucks or rollofs will be lined in advance. Standard practice for handling bulk asbestos waste is to line the truck bed with 6-mil polyethylene sheeting and then wrap, glue, and tape top seam to cover the top of the load. Decontaminate trucks before leaving the site.

Response 14: Truck lining and decontamination requirements have been added to Section 3.6.

Comment 15: Any contaminated stockpiled soils must be adequately wetted and covered at all times except when actively used. These soils may only be stockpiled inside an exclusion zone. Consideration should be given toward using lined and covered containers for contaminated soils instead of stockpiles within berms. The Work Plan should clarify that all asbestos-contaminated soils will be disposed as ACM and not only those with one percent or greater asbestos content.

Response 15: Stockpiling and disposal requirements have been added to Section 3.1.

Section 3.7 Equipment and Personnel Decontamination

Comment 16: UAC R307-801-14(1)(f) requires asbestos waste water to be filtered to 5 microns. A worker decontamination unit is required. Workers exposed to asbestos-contaminated soils should exit the site through the decontamination unit.

Response 16: The required filter has been changed from 10 microns to 5 microns. A 3-stage decontamination trailer with negative pressure and filters has been added as a requirement.

Comment 17: Further information is needed addressing the establishment of exclusion zones, contamination reduction zones (decontamination zones), and support zones within the site boundaries and how these areas will be managed under the proposed phased soil removal approach. As stated above, the Utah Division of Air Quality rules require that a decontamination unit be located on-site. Workers leaving the exclusion zone will need to exit through the decontamination unit. Workers entering the exclusion zone must wear personal protective equipment (PPE), including respirator, outer clothing such as a hooded Tyvek suit, shoe coverings and gloves. PPE should not be re-used, except for respirators. A special item such as leather gloves could be reused if it was always kept in the exclusion zone and disposed when no longer needed.

Vehicles and equipment leaving the exclusion zone are subject to the same procedures as individual workers. Workers inside the enclosed cabs of vehicles are subject to the same PPE requirements as all other workers working inside the exclusion zone. Enclosed cabs do not prevent the migration of asbestos fibers since the fibers can enter through the vehicle's ventilation system, even if the ventilation system is not running. A plan needs to be in place to thoroughly decontaminate all vehicles and equipment leaving the exclusion zone and how the water from that decontamination will be contained and then either placed back into the excavation or containerized for later disposal.

Response 17: Prior to mobilization the contractor shall submit a map and plan which details the location of the exclusion zones, contamination reduction zones, and support zones within the site boundaries. This submittal will also include details regarding worker and equipment decontamination.

Section 3.9 Site Security and Access

Comment 18: This section should address posting warning signs around the perimeter warning the general public of the asbestos hazards within the work area.

Response 18: Text has been added to Section 3.9 stating that warning signs will be posted.

Section 4.1 Asbestos Air Quality and Personnel Monitoring

Comment 19: There is no acceptable level of asbestos emissions for Libby amphibole asbestos to receptors outside the exclusion zone.

Response 19: The text in Section 4.1 has been modified to reflect this condition.

Comment 20: The contractor responsible for the air monitoring at the site needs to be a separate company from the contractor doing the actual work to avoid conflict of interest.

Response 20: A separate company from the contractor will be utilized for the air monitoring at the site.

Comment 21: More information must be provided on the air monitoring devices to be used on personnel and perimeter fence, and the proposed laboratory analyses, turnaround times, and detection levels.

Response 21: Additional details pertaining to the asbestos monitoring program have been added to Section 4.1, and further information on the specific instruments and detection limits will be provided upon selection of the contractor and testing companies to support the project.

Comment 22: The filters from the perimeter air monitors must be transported to a laboratory daily, either by hand or express mail. The laboratory must provide analytical results within a 24 hour turnaround time. Any detection of any Libby amphibole asbestos fibers demonstrates that the engineering controls at the site are not working and must be immediately improved or modified. Daily air monitoring must continue throughout the project, unless there is no disturbance of contaminated soils and any exposed soils have been covered.

Response 22: The text in Section 4.1 has been updated to include the requirements stated above.

Comment 23: Laboratory analyses must be provided to the UDEQ upon receipt, and to the EPA upon request, within 24 hours of receipt from the laboratory.

Response 23: The requirements for providing the laboratory analysis to the UDEQ and EPA have been added to Section 4.1.

Section 4.3 Demarcation Layer Installation

Comment 24: "In areas where cleanup work has already been performed, these barriers and caps already exist." The EPA is not aware of any barriers in place on the property that distinguish between clean and contaminated soils. There is orange plastic netting on the PacifiCorp property but it does not distinguish between clean and contaminated soils.

Response 24: The UDEQ is correct, we are not aware of prior cleanup of asbestos on the subject property, and have deleted the referenced sentence.

Section 4.4 Visual Inspection

Comment 25: Individuals conducting visual inspections for asbestos must be certified as a Utah Asbestos Inspector. A certified Utah Asbestos Contractor/Supervisor must direct site asbestos activities.

Response 25: Text has been added to Section 4.4 which specifies a Utah Asbestos Inspector and Contractor/Supervisor.

Section 4.6 Agency Reporting Requirements

Comment 26: Individuals documenting asbestos activities must be certified as a Utah Asbestos Inspector or certified Utah Asbestos Contractor/Supervisor must direct site asbestos activities, as appropriate.

Response 26: This requirement has been added to Section 4.4.

Comment 27: Copies of daily reports must be provided to the UDEQ, and to the EPA within 24 hours of request.

Response 27: This text has been added to Section 4.6.

Comment 28: Laboratory analyses must be provided to the UDEQ upon receipt from the laboratory, and to the EPA within 24 upon request.

Response 28: The requirements for providing the laboratory analysis to the UDEQ and EPA have been added to Section 4.1.

Comment 29: A copy of all reports generated or modifications to any reports regarding the site activities need to be provided to the UDEQ and EPA within 24-hours.

Response 29: This reporting requirement has been added to Section 4.6.

Comment 30: Representatives from the UDEQ and EPA may conduct site visits during some or all of the intrusive work at the site. The UDEQ and EPA retain their authorities to address any releases of asbestos at the site, including stopping work if necessary.


Response 30: Comment noted; no response required.

Mr. Urban
June 6, 2011
Page 9

Environmental
Resources
Management

We appreciate your review of the information and documentation provided with this letter. If you have any questions on information that has been provided, please contact David Wilson at 801-595-8400.

Sincerely,

A handwritten signature in black ink, appearing to read "David Wilson", with a stylized flourish at the end.

David Wilson, P.E., P.G.
Partner

cc: Joyce Ackerman, U.S. Environment Protection Agency, Region 8
Greg Sorenson, Utah Department of Environmental Quality, Division
of Air Quality
Vicki Bennett, Director, Salt Lake City, Division of Sustainability and
Environment
Royal DeLegge, Director, Salt Lake Valley Health Department,
Environmental Health